

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
GEORGE IVERSON,	)	
	)	C. A. NO. 04-cv-12079-NG
Plaintiff,	)	
	)	
v.	)	
	)	
BRAINTREE PROPERTY	)	
ASSOCIATES, L.P.,	)	
	)	
Defendant.	)	
_____	)	

DEFENDANT'S ASSENTED TO MOTION FOR EXTENSION OF  
TIME TO RESPOND TO PLAINTIFF'S MOTION FOR ATTORNEY'S FEES

Defendant Braintree Property Associates, L.P., ("Braintree" or "Defendant") hereby moves this Court for an extension of time up to and including November 19, 2007 for Defendant to file its Opposition to Plaintiff's Motion for Attorney's Fees, Costs, Expert Fees and Litigation Expenses. In support of this motion, Braintree states as follows:

1. On September 18, 2006, the respective parties filed a Settlement Agreement under seal.
2. By Order dated October 2, 2007, this Court Ordered Plaintiff's counsel to submit an application for attorney's fees by October 11, 2007.
3. On October 8, 2007, Plaintiff filed an Agreed Motion for Extension of Time to Move for Attorney's Fees.
4. On October 9, 2007, this Court granted Plaintiff's Motion for Extension of Time to Move for Attorney's Fees.

5. On October 22, 2007, Plaintiff filed its Verified Application for Attorneys' Fees, Costs and Expert's Fees and Accompanying Memorandum of Law. On October 23, 2007 plaintiff filed its Amended Motion to Its Verified Application for Attorneys' Fees, Costs and Expert's Fees.

6. Defendant's response to Plaintiff's Motion for Attorney's Fees is currently due November 5, 2007.

7. Defendant needs additional time to analyze and respond to plaintiff's motion for attorney's fees. In addition, the respective parties continue to negotiate with respect to the issue of attorney's fees. Accordingly, Defendant respectfully requests a two week extension in which to respond to plaintiff's motion for attorney's fees.

8. Plaintiff has assented to the request sought herein.

**WHEREFORE**, Defendant respectfully requests that this Court enter an Order extending the time within which it must respond to plaintiff's motion for attorney's fees up to and including November 19, 2007.

Respectfully submitted,

GEORGE IVERSON  
ASSOCIATES

By his attorney,

/s/ John P. Fuller  
John P. Fuller (pro hac vice)  
#644796)  
Fuller, Fuller and Associates, P.A.  
12000 Biscayne Boulevard, Suite 609  
North Miami, Florida 33181  
(305) 891-5199

BRAINTREE PROPERTY

By its attorneys,

/s/ Jennifer Martin Foster  
Jennifer Martin Foster (BBO)  
  
Greenberg Traurig LLP  
One International Place  
Boston, MA 02110  
(617) 310-6000

Dated: November 5, 2007

**CERTIFICATION PURSUANT TO LOCAL RULE 7.1**

Defendant, Braintree Property Associates, L.P. by and through counsel, hereby certify that they conferred with opposing counsel in a good faith attempt to resolve or narrow the issues raised in the Plaintiff's Motion for Attorney's Fees and that counsel for plaintiff has assented to this motion.

/s/ Jennifer Martin Foster  
Jennifer Martin Foster

**CERTIFICATE OF SERVICE**

I, Jennifer Martin Foster, hereby state that on November 5, 2007, I caused to be served a copy of the foregoing via the Court's CM/ECF System upon counsel for George Iverson, John P. Fuller, Esq., Fuller, Fuller & Associates, P.A., 12000 Biscayne Boulevard, Suite 609, North Miami, Florida 33181.

/s/ Jennifer Martin Foster  
Jennifer Martin Foster